

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION

FRENZETTA WILSON and RONNIE  
DICKERSON, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

NO. 4:20-cv-00152-KGB

v.

SANTANDER CONSUMER USA,

Defendant.

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES,  
LITIGATION COSTS, AND SERVICE AWARDS**

In accord with the Settlement Agreement and Release (ECF No. 57) (the "Settlement Agreement"), Plaintiffs' Counsel respectfully move this Court for an award of attorneys' fees of 30% of the gross Settlement Fund created by the settlement of the above-captioned action (the "Settlement"), or \$240,000, and reimbursement of litigation expenses in the amount of \$10,094.38. In addition, Plaintiffs' Counsel request that this Court award Plaintiffs Frenzetta Wilson and Ronnie Dickerson ("Plaintiffs" or "Settlement Class Representatives") a service award in the amount of \$5,000 each.

By the Court's Preliminary Approval Order (ECF No. 59), this Court preliminarily approved the Settlement, conditionally certified the Settlement Class, and directed that the notice be sent to Settlement Class Members informing them of the terms of the Settlement and their rights with respect thereto. As set forth in the Declarations of Randall K. Pulliam, James L Kauffman, and Jennifer M. Keough, being filed concurrently herewith, Plaintiffs' Counsel complied with the Preliminary Approval Order, including notice to Settlement Class members that Counsel would be

seeking an award of attorneys' fees of 30% of the Settlement, reimbursement of litigation expenses, as well as service awards to the Class Representative of \$5,000 each, and, to date, not one Settlement Class Member has objected. *See* Declaration of Jennifer M. Keough Regarding Notice Administration ("Keough Decl.") at ¶ 18.

Being filed contemporaneously herewith are Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Award of Attorneys' Fees, Litigation Costs, and Service Awards; Plaintiffs' Motion for Final Approval of Class Action Settlement; Plaintiffs' Memorandum of Law in Support of Motion for Final Approval of Class Action Settlement; and the aforementioned declarations. For the reasons set forth in the aforementioned papers, Plaintiff's Counsel respectfully request that this Court award attorneys' fees of \$240,000, or 30% of the gross Settlement proceeds; reimbursement of litigation expenses in the amount of \$10,094.38; and a service award to each Class Representative in the amount of \$5,000.

Dated: August 12, 2022

Respectfully submitted,

Randall K. Pulliam (ABN 98015)  
E. Lee Lowther III (ABN 2013142)  
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Proposed Settlement Class*